UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA Statesville Division

Civil Action No. 5:16-cv-00009- KDB-DCK

DELORIS GASTON, et al.,)
Plaintiffs,)
v.)
LEXISNEXIS RISK SOLUTIONS INC., et al.,) JOINT MOTION FOR) PRELIMINARY APPROVAL
Defendants.) OF PROPOSED SETTLEMENT

Plaintiffs Leonard Gaston and Deloris Gaston (the "Plaintiffs") and Defendants LexisNexis Risk Solutions Inc. ("LNRS") and PoliceReports.US, LLC ("PRUS") (the "Defendants")¹ (collectively, the "Parties"), move for entry of an Order granting Preliminary Approval of a Proposed Settlement embodied in a Settlement Agreement, attached as Exhibit A. The grounds for this Motion are set forth in a Memorandum filed contemporaneously herewith.

The Court's approval of the proposed settlement is warranted for the reasons fully stated in said Memorandum.

The Parties respectfully request that said Order include the following: (1) granting preliminary approval of the proposed settlement; (2) conditionally certifying a class and subclass for settlement purposes only pursuant to Fed. R. Civ. P. 23(b)(2); (3) appointing Class Counsel for the settlement class and subclass; (4) appointing a settlement administrator for the purpose of providing the required notice under the Class Action Fairness Act, 28 U.S.C. § 1715, and (5) scheduling the Court's final fairness hearing for the proposed settlement.

Case 5:16-cv-00009-KDB-DCK Document 163 Filed 11/03/20 Page 1 of 2

¹ "Defendants" as defined in the Settlement Agreement includes LNRS, PRUS, LexisNexis Claims Solutions Inc. and LexisNexis Coplogic Solutions Inc.

Dated: November 3, 2020

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